

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

GE RENEWABLES NORTH  
AMERICA, LLC,

Plaintiff,

v.

SKF USA INC.,

Defendant.

Civil Action No.  
1:25-cv-01157-VMC

**DEFENDANT SKF USA INC.'S  
PARTIAL MOTION TO DISMISS**

Pursuant to Federal Rule of Civil Procedure 12(b)(6), Defendant hereby moves to dismiss with prejudice Counts II and III of Plaintiff's Amended Complaint [Doc. 22]. In support of Defendant's Partial Motion to Dismiss, Defendant relies on Plaintiff's Amended Complaint and the accompanying Memorandum of Law, Declaration of Jeffrey Marchozzi, Declaration of C. Neil Gray, and the exhibits attached thereto.

Dated: May 15, 2025  
Atlanta, Georgia

Respectfully submitted,

**Christopher D. Kanne**

Stefanie Wayco  
Georgia Bar No. 132932  
Christopher D. Kanne  
Georgia Bar No. 627081  
DUANE MORRIS LLP  
1075 Peachtree Street NE, Suite 1700  
Atlanta, Georgia 30309-3929  
Telephone: +1 404 253 6900  
Email: [SMWayco@duanemorris.com](mailto:SMWayco@duanemorris.com)  
Email: [cdkanne@duanemorris.com](mailto:cdkanne@duanemorris.com)

Christopher W. Healy (*pro hac vice*)  
C. Neil Gray (*pro hac vice*)  
DUANE MORRIS LLP  
1540 Broadway  
New York, New York 10036  
Telephone: +1 212 692 1000  
Email: [CNGray@duanemorris.com](mailto:CNGray@duanemorris.com)  
Email: [CWHealy@duanemorris.com](mailto:CWHealy@duanemorris.com)

*Attorneys for Defendant SKF USA Inc.*

**LOCAL RULE 7.1 CERTIFICATE OF COMPLIANCE**

I hereby certify that the foregoing document filed with the Clerk of Court has been prepared in 14-point Times New Roman font, in accordance with Local Rule 5.1(C).

Dated: May 15, 2025

**Christopher Kanne**  
Georgia Bar No. 627081

**CERTIFICATE OF SERVICE**

This is to certify that I have filed a true and correct copy of the foregoing document with the Clerk of the Court using the CM/ECF system, which will automatically generate notice of filing to parties of record.

Dated: May 15, 2025

**Christopher Kanne**  
Georgia Bar No. 627081